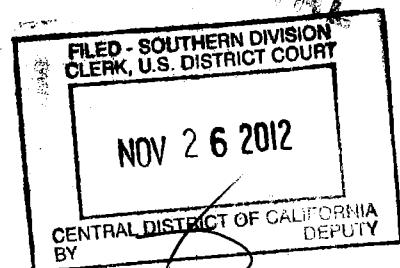


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15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA
17 SOUTHERN DIVISION

18 JAMES R. GLIDEWELL DENTAL
19 CERAMICS, INC. dba GLIDEWELL
20 LABORATORIES,

21 Plaintiff,

22 v.

23 KEATING DENTAL ARTS, INC.

24 Defendant.

25 AND RELATED COUNTERCLAIMS.

26 } Civil Action No.
27 } SACV11-01309-DOC(ANx)

28 } APPLICATION OF
29 } DEFENDANT KEATING
30 } DENTAL ARTS, INC. TO
31 } FILE UNDER SEAL
32 } EXHIBIT A TO THE
33 } DECLARATION OF DIANE
34 } MALLOS DONICH, THE
35 } DECLARATION OF
36 } ROBERT BRANDON, AND
37 } THE STATEMENT OF
38 } GENUINE DISPUTES OF
39 } MATERIAL FACT IN
40 } SUPPORT OF KEATING'S
41 } OPPOSITIONS TO
42 } GLIDEWELL'S MOTIONS
43 } FOR SUMMARY
44 } JUDGMENT

45 Date: December 17, 2012
46 Time: 8:30 a.m.
47 Crtrm: 9D

48 Honorable David O. Carter

49 2012 NOV 26 PM 3:29
50 CLERK US DISTRICT COURT
51 CENTRAL DISTRICT OF CALIFORNIA
52 BY [Signature]
53 NBS

LODGED

1 PLEASE TAKE NOTICE that, pursuant to L.R. 79-5.1, Defendant
2 Keating Dental Arts, Inc. ("Keating") hereby seeks an Order of this Court
3 permitting Keating to file under seal the following documents:

4 **1. Exhibit A to the Declaration of Diane Mallos Donich in Support**
5 of Keating's Opposition To James R. Glidewell Dental Ceramics, Inc. d/b/a
6 Glidewell Laboratories' ("Glidewell") Motion For Partial Summary Judgment
7 Re Trademark Misuse, Unfair Competition, Unclean Hands, Fair Use, And
8 Estoppel ("Exhibit A to Donich Declaration").

9 **2. Declaration of Robert Brandon in Support of Keating's**
10 Oppositions to Glidewell's Motions for Partial Summary Judgment ("Brandon
11 Declaration").

12 **3. Statement Of Genuine Disputes Of Material Fact In Support Of**
13 Keating's Opposition To Glidewell's Motion For Partial Summary Judgment Re
14 Infringement Of A Federally Registered Mark (First Cause Of Action) And
15 Dismissal Of Defendant's Second Affirmative Defense And First Counterclaim
16 ("Statement of Genuine Disputes").

- 17 • Exhibit A to the Donich Declaration is an internal business document
18 containing non-public information on Keating Dental Arts' sales,
19 which Keating has designated as "Attorneys' Eyes Only" pursuant to
20 the Confidentiality Order.
- 21 • The Brandon Declaration contains non-public information about
22 Keating Dental Arts' customers derived from Keating's internal
23 business records and this information has been designated by Keating
24 as "Attorneys' Eyes Only" pursuant to the Confidentiality Order.
- 25 • The Statement of Genuine Disputes contains excerpts from Keating
26 Dental Arts' business records that have been designated by Keating as
27 "Attorneys' Eyes Only" pursuant to the Confidentiality Order.

28 / / /

Accordingly, Keating respectfully requests that the Court permit the above documents to be filed under seal.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: November 26, 2016

10

Lynda J. Zadra-Sykes
Jeffrey L. Van Hoosier
David G. Jankowski
Attorneys for Plaintiff,
KEATING DENTAL ARTS, INC.

1 **PROOF OF SERVICE**

2 I am a citizen of the United States of America and I am employed in
3 Irvine, California. I am over the age of 18 and not a party to the within action.
4 My business address is 2040 Main Street, Fourteenth Floor, Irvine, California. I
5 am readily familiar with the firm's business practices for the collection and
6 processing of correspondence for mailing, and that mail so processed will be
7 deposited the same day during the ordinary course of business.

8 On November 26, 2012, I caused the within APPLICATION OF
9 DEFENDANT KEATING DENTAL ARTS, INC. TO FILE UNDER SEAL
10 EXHIBIT A TO THE DECLARATION OF DIANE MALLOS DONICH, THE
11 DECLARATION OF ROBERT BRANDON, AND STATEMENT OF
12 GENUINE DISPUTES OF MATERIAL FACT IN SUPPORT OF KEATING'S
13 OPPOSITIONS TO GLIDEWELL'S MOTIONS FOR SUMMARY
14 JUDGMENT to be served on the parties or their counsel shown below, by
15 placing it in a sealed envelope addressed as follows:

16 *Via Electronic Mail and Federal Express:*

17 Philip J. Graves
18 pgraves@swlaw.com
19 Snell & Wilmer LLP
20 350 S. Grand Ave., Suite 2600
21 Los Angeles, CA 90071

22 I declare that I am employed in the office of a member of the bar of this
23 Court at whose direction the service was made.

24 Executed on November 26, 2012 at Irvine, California.

25 Claire A. Stoneman
26 Claire A. Stoneman

27 14394925
28 112612